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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: §
§ Chapter 11
§
HIGHLAND CAPITAL MANAGEMENT, L.P.,¹ § Case No. 19-34054-sgj11
§
Debtor. §
§
HIGHLAND CAPITAL MANAGEMENT, L.P., §
§
Plaintiff, § Adversary Proceeding No.
§
vs. § 21-03003-sgj
§
JAMES DONDERO, §
§
Defendant. §

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

**DECLARATION OF JOHN A. MORRIS
IN SUPPORT OF THE DEBTOR'S OBJECTION TO MOTION TO
COMPEL DEPOSITION TESTIMONY OF JAMES P. SEERY, JR.**

I, John A. Morris, pursuant to 28 U.S.C. § 1746(a), under penalty of perjury, declare as follows:

1. I am an attorney in the law firm of Pachulski, Stang, Ziehl & Jones LLP, counsel to the above-referenced Debtor, and I submit this Declaration in support of the *Debtor's Objection to Motion to Compel Deposition Testimony of James P. Seery, Jr.* (the "Objection") being filed concurrently with this Declaration. I submit this Declaration based on my personal knowledge and review of the documents listed below.
2. Attached as Exhibit 1 is a true and correct copy of the Debtor's *Complaint for (I) Breach of Contract and (II) Turnover of Property of the Debtor's Estate* filed in the above-referenced adversary proceeding at Docket No. 1.
3. Attached as Exhibit 2 is a true and correct copy of *Defendant James Dondero's Original Answer* filed in the above-referenced adversary proceeding at Docket No. 6.
4. Attached as Exhibit 3 is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s First Request for Admissions* dated April 28, 2021.
5. Attached as Exhibit 4 is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s First Set of Interrogatories* dated April 26, 2021.
6. Attached as Exhibit 5 is a true and correct copy of *Defendant James Dondero's Amended Answer* filed in the above-referenced adversary proceeding at Docket No. 16.
7. Attached as Exhibit 6 is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s Second Set of Interrogatories* dated May 7, 2021.

8. Attached as Exhibit 7 is a true and correct copy of *Defendant James Dondero's Objections and Responses to Highland Capital Management, L.P.'s Second Request for Admissions* dated May 7, 2021.

Dated: May 18, 2021

/s/ John A. Morris
John A. Morris